



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00217.003673
HUNTERS POINT
SSIC NO. 5090.3

February 6, 1997

Richard Powell [1832]
Department of the Navy
Engineering Field Activity, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-5006

RE: Parcel B Draft Record of Decision dated February 14, 1997

Dear Mr. Powell:

Thank you for the opportunity to review the most recent draft of the Parcel B Record of Decision (ROD) before it is made draft final. My comments are provided as an attachment to this letter. Please note that EPA Regional Counsel Vicki Lang will not be able to provide her comments on the document until close of business Monday February 10, 1997. I will send them to you via fax at that time. Also, I have not completed reviewing the responsiveness summary. I will send any comments that I have on the responsiveness summary to you on February 10, 1997.

I hope that these comments will assist the Navy in finalizing the Parcel B Draft Final ROD. Please note that Should you have any questions, please contact me at (415) 744-2409.

Sincerely,

A handwritten signature in cursive script, appearing to read "Claire", followed by a horizontal line.

Claire Trombadore
Remedial Project Manager

cc: Bill McAvoy, EFAWEST, Code 1832.1
Michael McClelland, EFAWEST, Code 62.3
Cyrus Shabahari, Cal/EPA
Richard Hiett, RWQCB
Karla Brasaemle, Weston
Vicki Lang, RC-3-1
Deborah Judy, PRC

attachment

EPA COMMENTS ON THE DRAFT ROD
FOR PARCEL B DATED FEBRUARY 14, 1997
HUNTERS POINT SHIPYARD

- 1) Declaration, page 2, first set of bullets. The following sentence should be added in front of the introductory sentence for bullets regarding major components of the remedy: "The Navy has selected excavation and off-site disposal as the final remedy for Parcel B soil."

In addition, please delete references to offsite treatment for soils from the second bullet on page 2. This is misleading. The Navy's selected remedy does not include treatment. You can clarify by noting that the landfill may perform treatment of the soils prior to disposal in order to meet RCRA land disposal restrictions.

- 2) Declaration, page 2, second full paragraph. Delete this paragraph regarding the proposed plan history. It does not belong in the declaration at least not in such great detail.
- 3) Declaration, page 3. The contingency language is pretty vague. What are we going to do if there are exceedances of groundwater monitoring criteria? Will two hits be required before action is taken? Will monitoring be at least quarterly? The Navy needs to propose something in greater detail to the regulatory agencies.
- 4) Signature Block. Dan Opalski's block should read as follows:

Daniel Opalski
Chief
Federal Facilities Cleanup Branch
U.S. Environmental Protection Agency Region IX

- 5) Page 4. Although section 2.1 is titled site name and location, you have included all of the geology etc. here. Perhaps this section is better titled site name, location and description or add some subheadings that clarify.
- 6) Page 4. Correct line spacing error in last paragraph.
- 7) Page 7. Fourth line from the bottom - Shouldn't the "an" before RWQCB be "a"?
- 8) Page 8, section 2.2.2. Explain the IR program here. First there were PA then SI and finally IR sites which were carried through the FS. Explain why the two SI sites SI-31 and SI-45 carried through to the FS.

- 9) Page 11. Spell out NPL if it is the first time it is mentioned. Also the draft ROD states that the FFA was entered into in 1990. But the RWQCB did not become a signatory until January 22, 1992 and this is the date the BCT has been using for the date of the FFA. This date is used in the BCP and lots of other documents. The Navy needs to be consistent and use just one of these dates.
- 10) Page 11, section 2.2.3. State that the removals at IR-23 and IR-26 are party of the exploratory excavations removal action if they are. Add to the end of this paragraph that upon completion all of these Parcel B removal actions will be documented in a future CERCLA decision document such as the ROD for Parcel C. The navy should decide where it will document these as yet incomplete Parcel B removals and note it in this ROD. Example wording: "Once the above removal actions occurring on Parcel B are complete, documentation will be included in the ROD for ____ scheduled to be finalized on ____."
- 11) Page 12, last sentence of last paragraph. Add "are" after "RODs".
- 12) Page 13, Section 2.5. Mention again that there are 18 IR sites on Parcel B. Also might consider mentioning air sampling and radiation sampling both of which indicated no problems on Parcel B. Typo in the last paragraph - add "such" after "(TPH)".
- 13) Page 14, fourth paragraph. Please cite the specific section of the RI report where nature and extent can be found. Please do the same for other references in the ROD such as to the RI HHRA (see page 17, second paragraph, last sentence).
- 14) Section 2.6.1. EPA has spent a lot of time on this type of language for the Parcel D Proposed Plan. You may want to use some of that language for presenting general concepts such as what the exponential notation means.
- 15) Page 16. First paragraph, last sentence: Please reword, it is not clear as written. Last paragraph: define NCP. Explain that there is a risk range but that the NCP further states that 10^{-6} is the point of departure.
- 16) Page 24, Section 2.6.2. This section is very misleading. The ecological assessment is not evaluating the groundwater to Bay pathway and potential risks to marine life. At this point we only have scoped sediment chemistry into that study. There are no water column studies. Please speak with the eco risk people and ensure that this paragraph is accurate.

- 17) Page 24, Section 2.7, first sentence. Typo - "present" should be "presents".
- 18) Section 2.7. This section is poorly written and poorly organized. Why not just have a section on ARARs that clearly lays them all out and why they are ARARs. In 2.7.1 you lay out some RWQCB resolutions using some agree to disagree language. Very few other ARARs are mentioned. What about the air ARARs that come up in the discussions of the alternatives? Also, you state on page 26 that the Coastal Zone management Act and California Coastal Act are ARARs but there is no analysis. That is, what portions of the Parcel D cleanup will be subject to what portions of the Acts? (Also is there a California Coast Act? If not, there is a typo in the middle of paragraph 2 page 26.) Finally, at the bottom of page 26, why is CAMU mentioned? I thought the BCT agreed there would be no CAMU. CAMU subjects the Navy to all sorts of administrative headaches - delete this!
- 19) Page 28, first paragraph regrading risk range. See EPA comment 15 above.
- 20) Page 34, alternative S-2 and all subsequent alternative discussions. Please add air ARARs discussions to the ARARs section of the ROD.
- 21) Page 35, alternative S-3 and Page 35, alternative S-4. Add to the text some discussion about how metals/inorganics will be addressed by this alternative. Only soils with VOCs are mentioned. Also, ARARs discussion is poor. Again if the ARARs section of the ROD is complete you can refer to that not section 2.7.1 as well as previous alternative discussions - it gets confusing. Also, are the cubic yards of soil mentioned for various treatments under each alternative correct?
- 22) Page 38, alternative S-6. Where is S/S mentioned in the discussion? Also elaborate on the mysterious criteria for placement of soil at the Parcel E landfill as a foundation cap.
- 23) Page 42, alternative GW-3. It is important to determine whether or not the POTW has an restrictions on the volume of treated water it can accept from any one source 24 hours a day, especially during the rainy season. Has the Navy done this or is this volume not a problem?
- 24) Page 43, 45. The nine criteria does not include "regulatory acceptance" just "state acceptance." We have had this discussion before, please do not use regulatory acceptance.
- 25) Page 44, last paragraph on reduction of toxicity, mobility and volume through treatment criterion. I don't think the Navy

can say that S-2 meets this criteria, it just doesn't. Treatment at the landfill is not what this criterion is getting at.

- 25) Page 45, last sentence. After "landfill," add "and in response to community concerns about onsite treatment and disposal."
- 26) Page 46, Compliance with ARARs. You state compliance with chemical-, location- and action-specific ARARs but your ARARs discussion didn't even mention these categories. Again, the ARARs analysis is lacking. Perhaps you should rewrite with separate sections on soil versus groundwater ARARs.
- 27) Page 49, contingency language. See EPA comment 3 above.
- 28) Section 2.10. This section needs to be redrafted. It is very long and it inaccurate. Section 2.10.2 should be redrafted after the earlier ARARs section of the ROD is corrected for accuracy. Again, CAMU should not be used. Regarding Sections 2.10.4 and 2.10.5, the Navy cannot in good faith state that it is meeting these criteria with its selected remedy. Also, delete the following statement under 2.10.5: "with concurrence of the regulatory agencies." EPA does not believe onsite treatment is impracticable which is how the sentence reads. However, EPA does support the Navy's selected remedy because of community concerns raised and cost effectiveness.

Memorandum

To: Claire Trombadore (SFD-8-2)
Remedial Project Manager

From: Daniel Stralka Ph.D. (SFD-8-B)
Regional Toxicologist

Subject: Comments on Hunter's Point Parcel B draft final record of decision dated February 14, 1997.

Date: 5 February 1997

I reviewed the above document and it looks O.K. with a few minor suggestions.

1. Is DNAPL defined in the glossary?
2. Page 16, section 2.6.1, first complete paragraph. Change the last sentence to read "...even though typical exposure to the chemical would *may* be far less".
3. Page 16, section 2.6.1, last paragraph. Change the fourth sentence to read "An ELCR of 1×10^{-6} means that one person in a population of a million *exposed to the same contaminate under the same conditions may* could develop cancer as a result of a 30 year exposure in a 70-year lifetime, under the specific exposure scenario."
4. Page 20, table 3. Remove the line and second IR-25.
5. Page 21, table 4. Typo in title "exposure".